

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF MISSISSIPPI
ABERDEEN DIVISION**

WILL McRANEY

PLAINTIFF

V.

No. 1:17cv080-GHD-DAS

**THE NORTH AMERICAN MISSION BOARD
OF THE SOUTHERN BAPTIST CONVENTION, INC.**

DEFENDANT

**THE NORTH AMERICAN MISSION BOARD
OF THE SOUTHERN BAPTIST CONVENTION, INC.'S
MOTION FOR SUMMARY JUDGMENT**

ORAL ARGUMENT REQUESTED

Defendant The North American Mission Board of the Southern Baptist Convention, Inc. (“NAMB”), pursuant to Fed. R. Civ. P. 56, respectfully moves for summary judgment in its favor and dismissal of the Plaintiff’s claims with prejudice.

1. Plaintiff advances six claims against NAMB: (i) two claims for interference with contract and economic relations (Counts I and IV); (ii) two claims for defamation (Counts II and V); and (iii) two claims for infliction of emotional distress (Counts III and VI).

2. NAMB is entitled to judgment as a matter of law on each of Plaintiff’s claims because (i) the First Amendment precludes adjudication of this lawsuit; (ii) Plaintiff released his claims against NAMB; and (iii) the evidence shows that there are no genuine issues of material fact as to the merits of each of Plaintiffs’ claims, and NAMB is therefore entitled to judgment pursuant to Federal Rule of Civil Procedure 56.

3. NAMB’s Motion for Summary Judgment is based upon the Memorandum Brief and the following exhibits, which are attached to the Declaration of Timothy Perla:

<u>EXHIBIT</u>	<u>DESCRIPTION</u>
1.	Strategic Partnership Agreement executed between NAMB and the Baptist Convention for Maryland/Delaware (“BCMD”)
2.	Excerpts of March 2, 2023 deposition transcript of Kevin Ezell
3.	May 4, 2023 deposition transcript of William Warren
4.	January 14, 2015 letter from BCMD to Kevin Ezell
5.	February 3, 2015 email from Jeff Christopherson to Steve Davis and attached document
6.	November 14, 2014 email chain between Jeff Christopherson and Will McRaney
7.	August 25, 2014 email from Jeff Christopherson to Will McRaney
8.	November 18, 2014 email from Jeff Christopherson to Will McRaney
9.	November 20, 2014 email from Kevin Ezell to Will McRaney
10.	December 2, 2014 letter from NAMB to BCMD
11.	February 6, 2015 Resolution of Support
12.	March 18, 2015 email from Steve Davis to Will McRaney
13.	June 8, 2015 BCMD General Mission Board Meeting Minutes
14.	June 4, 2016 email chain between Michael Trammell and William Warren
15.	August 26, 2015 email chain between William Warren and Will McRaney
16.	May 19, 2016 NAMB Trustee Information Conference Call minutes
17.	Separation Agreement and Release
18.	February 4, 2016 email from Will McRaney to NAMB trustees and attached letter
19.	June 13, 2016 email from Bill Ingram to Rick Curtis and attached letter and document
20.	February 5, 2016 Tom Wigginton Outlook item and attached photograph

21. Excerpts of February 28, 2023 deposition transcript of Rob Paul
22. Exhibit D2 from February 28, 2023 deposition of Rob Paul
23. Will McRaney Facebook and Twitter post samples
24. April 25, 2023 deposition transcript of Barry Hankins
25. September 19, 2014 email from Ron Blankenship to Jeff Christopherson
26. November 26, 2014 letter from Will McRaney to Kevin Ezell
27. November 8, 2015 email chain between William Warren and Thomas Winborn
28. September 9, 2015 email from Mark Dooley to Will McRaney
29. Affidavit of Jimmy Crosby
30. Affidavit of Scott Thomas
31. December 9, 2014 NAMB Executive Committee Conference Call minutes
32. August 19, 2014 email chain between Kevin Ezell and Aaron Coe
33. October 10, 2014 email from Will McRaney to Tom Stolle
34. Excerpts of November 3, 2022 deposition transcript of Tom Wigginton
35. Excerpts of May 1, 2023 deposition transcript of William Barker
36. September 13, 2015 email from Mark Dooley to Will McRaney
37. Excerpts of February 16, 2023 deposition transcript of Danny De Armas
38. November 18, 2014 email from Will McRaney to Jeff Christopherson
39. Plaintiff's Amended Objections and Fifth Supplemental Responses to NAMB's First Set of Interrogatories
40. Excerpts of February 8, 2023 deposition transcript of Will McRaney

WHEREFORE, PREMISES CONSIDERED, NAMB respectfully requests that this Court grant its Motion for Summary Judgment.

Respectfully submitted, this 18th day of May, 2023.

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document with the Clerk of the Court the using the Court's ECF system, which sent notification of such filing to all counsel of record.

SO CERTIFIED, this 18th day of May, 2023.

s/ Timothy Jeffrey Perla

TIMOTHY JEFFREY PERLA